Solway Group Policy
Human Rights

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Short description

This policy defines the key commitments and requirements, and principal processes for the protection and respect of human rights with the Solway Group.

Approved by the SUSC		**Date** 15.09.2025	**Resolution #**

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Content

1 Purpose 3
2 Objectives 3
3 Scope 3
4 Additional applicable documents 3
5 Our commitments 3
6 Procedures 4
6.1 Engagement, information and capacity building 4
6.2 Risk assessment 4
6.3 Due Diligence 4
6.4 Grievance mechanism 4
6.5 Remediation 5
7 Reporting and Monitoring 5
8 Definitions 5
9 Amendment History 5

1 Purpose

The purpose of this Policy is to define the Human Rights commitments, principles and rules applicable to Solway Investment Group (Solway or Group) and its subsidiaries. The policy provides a framework for planning and implementing relevant procedures and controls.

2 Objectives

This policy aims to ensure the consistent, transparent, and effective integration of relevant human rights standards across our organization, supporting our business objectives while complying with applicable laws, regulations, and responsible business practices.

3 Scope

This Policy applies to Group and Subsidiary activities and is reviewed annually to reflect changes in the external and internal environments that may affect business objectives.

This Policy applies to Directors and Officers of the Solway Investment Group and Subsidiaries.

Where the Group or Subsidiary has ownership and management responsibility less than fifty percent, Solway will seek to use its influence to encourage adoption of these Policy requirements.

4 Additional applicable documents

- Solway Group Code of Conduct
- Solway Group Sustainability Policy
- Solway Group Sustainability Management Standards

5 Our commitments

At Solway, we are committed to respecting and promoting human rights across our operations and supply chain, upholding international standards, and preventing human rights infringements. We strive to create and share sustainable value with communities, employees, and stakeholders.

We commit to:

- Complying with applicable national laws and regulations where we operate (and where differences exist between our standards and local customs, norms, rules or regulations, applying the higher standard), and respecting internationally recognised human rights as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.
- Operating in a manner that is consistent with the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Fostering a culture of respect for human rights and adopting and applying an open and transparent engagement and consultation process that ensures the meaningful participation of affected stakeholders.
- Recognizing and respecting the unique role, contribution and concerns of Indigenous peoples and their participation in decision-making processes.
- Not tolerating any form of discrimination, harassment or physical assault, or any form of child, forced or compulsory labour.
- Ensuring fair wages, safe working conditions, and the right to collective bargaining for all employees.
- Ensuring that our operational security measures respect and protect human rights and are conducted by trained personnel and collaborating with public and private security forces to uphold human rights standards at any time, in line with the requirements of the Voluntary Principles on Security and Human Rights (VPSH).
- Minimizing environmental impacts to protect the health and livelihoods of local communities.
- Implementing sustainable practices to safeguard natural resources for future generations.

6 Procedures

In our operations, we apply principles and procedures to identify, manage, and mitigate human rights risks and impacts, and to provide or support remedy where needed. This is done in line with the UN Guiding Principles on Business and Human Rights (UNGPs) to ensure respect for human rights across our operations and supply chain.

6.1 Engagement, information and capacity building

To understand the context and effectively engage with affected stakeholders, we

- Foster a culture of human rights respect across our organization and value chain, prioritizing early, meaningful, and ongoing dialogue with those affected by our operations.
- Raise awareness for our programs and actions and aim to enhance a shared understanding of human rights in the regions where we operate.
- Develop or participate in knowledge-sharing and capacity building initiatives for employees, contractors, suppliers and other stakeholders.
- Reconsider or discontinue the engagement with upstream and downstream suppliers where we have reasonable grounds to believe that they are involved in, or sourcing from any party committing serious human rights abuses or supporting non-state armed groups.

6.2 Risk assessment

To effectively identify, understand and manage human rights related risks, we

- Assess actual and potential human rights related risks and impacts in our operations and supply chains, integrating and acting upon the findings
- Conduct an initial Human Rights Impact Assessment (HRIA) across all our operations, including conflict-affected and high-risk areas (CAHRA), followed by an annual review, in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- Monitor the effectiveness of our procedures, and communicate how actual and potential impacts and risks are addressed.
- Integrate the findings into our risk framework and business decision-making processes.

6.3 Due Diligence

The due diligence process is aligned with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We

- Engage with potentially affected stakeholders and rights holders to continuously enhance our understanding of potential impacts of our operations.
- Conduct risk based human rights due diligence in our operations and supply chains to identify, and seek to prevent, mitigate, and account for how we address adverse human rights impacts.
- Integrate findings from our due diligence into our risk framework, and monitor and evaluate the effectiveness of our approach.

6.4 Grievance mechanism

Solway is committed to providing clear, accessible channels for individuals and communities to raise concerns. Effective grievance mechanisms help us address human rights impacts early, ensuring accountability, transparency, and trust.

- We provide accessible and effective reporting lines and grievance mechanisms for employees, business partners and community members to raise any concerns.
- We seek to ensure all grievances are addressed promptly and fairly, in line with the principles laid out in the UNGPs. This process includes receipt and acknowledgement of a grievance, fact finding and investigations, appeal options, resolution, response and feedback, and close out.

- Under our Code of Conduct, we do not allow any form of retaliatory action to be taken against anyone for speaking up or cooperating with an investigation.

6.5 Remediation

Solway is committed to providing effective remediation for any human rights harm we cause or contribute to, ensuring accountability and support for affected individuals, in accordance with applicable laws and internationally recognized human rights standards.

- We aim to provide or to cooperate in providing remedies for adverse human rights impacts, and we will continue to work with stakeholders to identify ways to communicate how complaints or grievances have been addressed and integrated back into our due diligence process.
- Whilst all efforts will be made to resolve grievances amicably, if a grievance cannot by resolved, we will seek to involve external experts, neutral parties, traditional councils, or local and regional authorities to help resolve the issue.

7 Reporting and Monitoring

Solway continuously reviews and assesses our practices and will update our human rights policy and practices, as and when necessary, and to reflect evolving standards and stakeholder expectations.

We will communicate transparently about our human rights efforts, impacts, and performance, and report regularly on human rights performance through our reports and online disclosures.

We commit to continuous improvement in our approach to human rights and will monitor the effectiveness of the procedures related to our human rights commitments.

8 Definitions

Term	Definition
Human Rights	Human rights are the fundamental freedoms and protections inherent to all people, as defined in international standards such as the Universal Declaration of Human Rights and core UN and ILO conventions.
Grievance	A grievance is a concern or complaint raised by an individual or group who believes they have been negatively affected by a company's actions or decisions.
Grievance mechanisms	A corporate grievance mechanism is a formal process provided by a company to enable individuals or communities to raise concerns, seek remedy, and resolve issues related to the company's operations, in line with international human rights standards.
Due Diligence	A due diligence is the process by which a company identifies, assesses, prevents, and addresses actual or potential adverse impacts on people and the environment across its operations and value chain.
Remediation	Remediation is the process of providing a remedy to individuals or communities harmed by a company's actions, addressing and correcting the impact, or providing for compensation.

9 Amendment History

Date	Version	Revised Content
12.09.2024	1.0	Created and approved
15.09.2025	2.0	Revised and approved